

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

UNITED STATES OF AMERICA

v.

Case No. 4:20-CR-304-P

MARY JANE MCINTYRE (01)

GOVERNMENT’S EXPERT WITNESS DESIGNATION

The government files the following designation of expert witness in the above-styled case:

- (1) U.S. Postal Service Special Agent Duane Vasquez, U.S. Postal Inspector Jared Lonborg, and or another similarly qualified expert regarding drug trafficking.

This expert will testify from his expertise on techniques and processes unique to drug trafficking. More specifically, this expert will testify about:

- (1) the use and utility of couriers to transport narcotics;
- (2) the street-value of methamphetamine, and other relevant illegal drugs;
- (3) the common transportation routes of methamphetamine from Mexico to and throughout the United States;
- (4) the use of multiple cellular telephones including the frequent disposal of such;
- (5) the use of other drug trafficking paraphernalia (e.g., digital scales, money counters, baggies);
- (6) the use of coded language to disguise the fact that drug dealers are talking about distributing drugs;
- (7) common business practices between and amongst drug dealers (e.g., the concept of “fronting” drugs or delivering drugs to another person on consignment; the concept of “vouching” for another person in the context of purchasing drugs from a source of supply; the accrual of a drug-debt for a person/courier who loses drugs due to law enforcement intervention or otherwise); and

(8) the use of residences and/or other establishments (e.g. “game rooms”) to conduct drug transactions between and amongst a wide and varying range of drug distributors and drug customers.

- (2) DEA Forensic Chemist Phanneth Som, U.S. Postal Service Forensic Chemist Kimberlie A. Ross, and / or another similarly qualified chemist.

This expert will testify as to his/her opinion regarding the identification of narcotics seized in this case.

Respectfully Submitted,

ERIN NEALY COX
UNITED STATES ATTORNEY

s/ Robert J. Boudreau

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CERTIFICATE OF SERVICE

I hereby certify that on November 19, 2020, I electronically filed the foregoing document with the clerk for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. The electronic case filing system sent a “Notice of Electronic Filing” to the attorney of record who have consented in writing to accept this Notice as service of this document by electronic means.

s/ Robert J. Boudreau

ROBERT J. BOUDREAU
Assistant United States Attorney